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10 Attorneys for Plaintiffs

11 **UNITED STATES DISTRICT COURT**

12 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

13 L.A. Taxi Cooperative, Inc. dba Yellow Cab  
Co.; Administrative Services SD, LLC dba  
14 Yellow Radio Service; All Yellow Taxi, Inc.  
dba Metro Cab; American Cab, LLC;  
15 American Cab, LLC dba Pomona Valley  
Yellow Cab; Bell Cab Company, Inc.; TM-  
16 MTM, Inc.; Big Dog City Corporation dba  
Citywide Dispatch, Citywide Taxi, and Big  
17 Dog Cab; Cabco Yellow, Inc. dba California  
Yellow Cab; C&J Leasing, Inc. dba Royal  
18 Taxi; G&S Transit Management, Inc.; Gorgee  
Enterprises, Inc.; LA City Cab, LLC; Long  
19 Beach Yellow Cab Co-operative, Inc.;  
Network Paratransit Systems, Inc.; South Bay  
20 Co-operative, Inc. dba United Checker Cab;  
Taxi Leasing, Inc. dba Yellow Cab of Ventura  
21 County; Tri-City Transportation Systems, Inc.;  
Tri Counties Transit Corporation dba Blue  
22 Dolphin Cab of Santa Barbara, Yellow Cab of  
Santa Maria, and Yellow Cab of San Luis  
23 Obispo; and Yellow Cab of South Bay Co-  
operative, Inc. dba South Bay Yellow Cab,

24 Plaintiffs,

25 vs.

26 Uber Technologies; Rasier, LLC; and Rasier-  
27 CA, LLC,

28 Defendants.

CASE NO. 3:15-cv-01257-JST

**STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND PLAINTIFFS'  
TIME TO MOVE TO STRIKE  
DEFENDANTS' ANSWER**

**INTRODUCTION**

Plaintiffs L.A. Taxi Cooperative, Inc. dba Yellow Cab Co.; Administrative Services SD, LLC dba Yellow Radio Service; All Yellow Taxi, Inc. dba Metro Cab; American Cab, LLC; American Cab, LLC dba Pomona Valley Yellow Cab; Bell Cab Company, Inc.; TM-MTM, Inc.; Big Dog City Corporation dba Citywide Dispatch, Citywide Taxi, and Big Dog Cab; Cabco Yellow, Inc. dba California Yellow Cab; C&J Leasing, Inc. dba Royal Taxi; G&S Transit Management, Inc.; Gorgee Enterprises, Inc.; LA City Cab, LLC; Long Beach Yellow Cab Co-operative, Inc.; Network Paratransit Systems, Inc.; South Bay Co-operative, Inc. dba United Checker Cab; Taxi Leasing, Inc. dba Yellow Cab of Ventura County; Tri-City Transportation Systems, Inc.; Tri Counties Transit Corporation dba Blue Dolphin Cab of Santa Barbara, Yellow Cab of Santa Maria, and Yellow Cab of San Luis Obispo; and Yellow Cab of South Bay Co-operative, Inc. dba South Bay Yellow Cab (collectively, "Plaintiffs") and Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC ("Defendants"), by and through their undersigned counsel, hereby stipulate and agree to continue Plaintiffs' deadline to move to strike any part of Defendants' Answer by 14 days, through and including September 28, 2015. In support of the instant stipulation, the Parties state as follows:

WHEREAS, on August 3, 2015, Plaintiffs filed their Amended Complaint against Defendants (Dkt. 50).

WHEREAS, on August 24, 2015, Defendants filed their Answer (Dkt. 52).

WHEREAS, Plaintiffs have written a letter to Defendants regarding certain alleged deficiencies in Defendants' Answer that, according to Plaintiffs, would be the appropriate subject of a motion to strike under Rule 12(f) of the Federal Rules of Civil Procedure.

WHEREAS, the parties intend to have further meet and confer discussions regarding Defendants' Answer that may eliminate the need for Plaintiffs to file such a motion to strike.

WHEREAS, the parties' proposed extension of time will allow the parties (1) sufficient time to have such meet and confer sessions, and (2) sufficient time for Plaintiffs—if necessary—to prepare their motion to strike Defendants' Answer.

1 WHEREAS, the parties have sought—and the Court has granted—an extension of time for  
2 Defendants to respond to the Original Complaint (Dkt. 11).

3 WHEREAS, the Court has not previously modified the deadline for Plaintiffs to file a  
4 motion to strike any part of Defendants' Answer.

5 WHEREAS, the Parties' proposed extension of Plaintiffs' deadline to file a motion to strike  
6 any part of Defendants' Answer will not change or alter the date of any event or any deadline  
7 already fixed by Court order;

8 WHEREAS, Plaintiffs respectfully reserve the right to seek additional time to move to  
9 strike any part of Defendants' Answer, if necessary and for good cause shown;

10 NOW THEREFORE, the Parties hereby STIPULATE and AGREE that Plaintiffs' deadline  
11 to move to strike any part of Defendants' Answer is extended through and including September  
12 28, 2015.

13 IT IS SO STIPULATED.

14  
15 Dated: September 9, 2015

By: /s/ Benjamin E. Shiftan

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